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Via PACER/ECF

May 8, 2023

Hon. P. Kevin Castel
U.S. District Judge, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: *United States v. Brandon Simpson*
Case # 1:20-CR-00163-PKC

*Application GRANTED
SO ORDERED
J. M. H.
USDJ
5-8-23*

Dear Judge Castel:

In lieu of a formal motion, unless the Court requests such a motion to be filed upon a reading of this letter, we would respectfully request that the Court grant the following relief to Defendant Brandon Simpson:

- GRANTED*
1. Amendment to pretrial supervision conditions permitting Mr. Simpson to report to probation telephonically or virtually; and
 2. Permission to travel to California with his wife and two children, *depart July 28, 2023 return August 5, 2023.*


Mr. Simpson works as a driver for Dana Distributors in Goshen, New York. He typically works Monday to Friday, starting as early as 4:00am each morning and ending between 1:00pm and 3:00pm each afternoon. Additionally, his wife works a full-time job and they have two school-aged children (14 and 8 years old) together. These factors make it difficult for Mr. Simpson to report in person to probation. However, he does have the capability to report telephonically or virtually to probation as often as required by his probation officer.

Mr. Simpson also seeks permission to travel to California with his wife and children to visit his grandmother. They will be staying at 29922 Sycamore Ridge Road, Murrieta, California 92563. They plan to depart New York from JFK International Airport on July 28, 2023; they will return to New York on August 5, 2023.

Thankfully, AUSA Sarah Mortazavi and PO Lea Harmon consented to our requests. We believe their consent is a direct result of Mr. Simpson's excellent behavior while on pretrial supervision.

Thank you for your consideration of our request. We look forward to the Court's decision.

Respectfully submitted,
LARKIN INGRASSIA, LLP

By: 
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